This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

MIM Date 2/15/2005



1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

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Sincerely

Daryl F. Koch FFA/CO Manager

DK/ic

cc:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID SITE 041 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

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DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Pits/Mounds Northeast of EOCR

Site ID:

041

Operable Unit:

10-08

Waste Area Group:

existing historical documentation.

10

Summary – Physical Description of the Site:

Site 041 consists of two pits and mounds located approximately 1,200 ft north of the Security Training Facility (STF)/Experimental Organic Cooled Reactor (EOCR), (now dismantled). This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new site identification form was completed for this site. As part of the process, a field team wrote a site description and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates of one mound are

for the second mound). The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of

INEEL WAG 10 and Cultural Resources investigated the site on June 6, 2001. The investigation revealed that Site 041 contained two large pits, resembling bulldozer or backhoe excavations, approximately 10 ft wide x 40 ft long x 2 ft deep with a mound at the end of each pit. The pits and mounds have a consistent volume and resemble numerous other pits/mounds across the INEEL. Anecdotal information suggests that the pits/mounds resulted from geotechnical investigations (test excavations) for potential borrow pits (tested for depth to basalt, soil types, soil values, etc.).

No visible road leads to the site; there is no indication of stained or discolored soil, buried material, or visible debris near or surrounding the pits/mounds. Native grasses and sagebrush are fairly well established near the pits; however, the weedy and sparse vegetation on the mounds is typical of that found on other excavated soil areas found across the INEEL. There is no visual evidence of hazardous constituents or evidence that waste has recently been disposed of at this site. The description of the site conditions is based on recent site investigations and INEEL Cultural Resource research. No field screening or sample data exist for this site.

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site and no empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with Cultural Resource personnel, and photographs revealed no visual evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 041 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility that contaminant levels at this site are above risk-based limits is remote. Field surveys and visual observations of the debris and surface soil indicated no evidence of hazardous constituents. If hazardous materials and wastes were placed into this area, evidence such as stained soil, odors, loss of vegetation, fibrous materials, or other indications of contamination would be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides or other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY - Other Decision Drivers:

There are no other decision drivers for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews, historical knowledge, and photographs indicate it is highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located in a remote area with no viable pathways or receptors. The site is located in the southwestern section of the INEEL approximately 2 miles east of the Central Facilities Area (CFA) and 1,200 feet north of the STF/EOCR. Nothing present at this site indicates the presence of historical or threatened release of hazardous substances, pollutants or contaminants. These pits/mounds are similar to numerous others located across the INEEL that are likely related to construction/test pit operations. There is no evidence that the pits/mounds contain anything that pose a risk to human health or the environment.

Signatures: Wendled blee		# Pages:	16	Date:	08/24/01
Prepared By: Marilyn Paarmann, WPI	DOE W	AG Manager	:	_	
Approved By: Mill Tolu 9-2-09	Indepen	dent Revie	My Let	T.R.	19-28-04

DECISION	STAT	EMEN.	T
(DOI	E RPN	A)	

Date Received: 1/14/05

Disposition:

Site 041 15 classified as no action. This determination will be recorded in the site database and listed in the 2005 INEEL Integrated 5-Year Review

Date: 1/14/65 # Pages:

Name: Kathleem Hair Signature: Walkleen E Hair

DECISION STATEMENT	
(EPA RPM)	(

5, te -041

Date Received:

Disposition:

Should be classified as a no action site.

Date: 9-23-04

Pages:

Name: Dennis Faulk

Signature:

Date:

Name:

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DECISION STATEMENT (IDEQ RPM)	
Date Received: May 8, 2002	
Disposition:	
Site 041	
Site 041 consists of two pits and mounds located about 1,200 feet north of EOCR/STF. The pits are about 10 feet wide by 40 feet long and 2 feet deep. There is a mound at the end of each pit; the volumes of the mounds and pits are consistent. These pits and mounds resemble other pits and mounds located across the INEEL. Anecdotal information suggests these pits and mounds were the result of geotechnical investigations for potential borrow pits. No roads lead to the site and there is no visible evidence of stained soil, buried material, or debris near the pits. Native vegetation is fairly well established. The State recommends this site for No Further Action.	5

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Signature:

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PROCESS/WASTE WORKSHEET	/ORKSHEET	
SITE ID: 041	PROCESS: WASTE:	Pits/Mounds Located North of the Security Training Facility (STF)/Experimental Organic Cooled Reactor (EOCR) Gravel/soil
Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Two large gravel excavation pits and mounds likely used for INEEL related activities	Excavation pits/mounds that may have been used for geotechnical investigations, to look for suitable road construction material, or for other construction activities at the INEEL.	Artifact: Gravel Excavation Pits and Mounds Location: The site is located approximately 2 miles east of CFA and 1,200 feet north of the former STF/EOCR site. Description: Site 041 contains two large pits, approximately 10 ft wide x 40 ft long x 2 ft deep with mounds at the end of each pit. The pits and mounds have a consistent volume and resemble numerous other pits/mounds across the INEEL.

CONTAMINANT WORKSHEET					
SITE ID: 041	PROCESS:	Pits/Mounds Located North of the Security Training Facility (STF)/Experimental Organic Cooled Reactor (EOCR)	orth of the Security ⁻ yanic Cooled Reactc	Training Facility or (EOCR)	
	WASTE:	Gravel/soil			
Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (high/med/	Col 9 Overall Reliability (high/med/ Iow)
None	Soil	None	Not Applicable	Low	High

Question 1.	What are the waste generation processes, locations, and dates of operation associated with this site?
Block 1	Answer:
excavations) f values, etc. Th was being bui Special Respo	ists of two large pits and mounds likely excavated for geotechnical investigations (test or potential borrow pits. INEEL personnel tested for depth to basalt, soil types, soil nese pits/mounds were likely dug more than forty years ago when the EOCR facility (1959-1963). The facility was abandoned in 1963; it was later used as the STF onse Team training facility from 1983-1990. The site is located in the southwestern INEEL approximately 2 miles east of CFA and 1,200 feet north of STF/EOCR.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
	n INEEL Environmental Restoration Environmental Safety and Health (ER ES&H) ealed that Site 041 contains two large gravel pits/mounds likely related to past INEEL es.
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)
Information wa	as confirmed with interviews, site investigations, historical research, and photographs.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
(one of a philade mexico) a course from	

Question 2.	What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?
Block 1	Answer:
two large grav	10 and Cultural Resource personnel visited this site June 6, 2001. Site 041 consists of vel excavation pits and mounds likely dug for past INEEL geotechnical investigations. cated in the southwestern section of the INEEL approximately 2 miles east of CFA and rth of STF/EOCR.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
excavation pi	10 and Cultural Resource personnel have confirmed that the site includes two large its/mounds likely related to INEEL geotechnical research or construction operations, ose a potential threat to human health or the environment.
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)
	tion was confirmed by investigations, interviews, and historical research. Photographs current site conditions.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
Anecdotal Historical Procurrent Procurrent Procurent Photographs	cess Data QA Data S

Question 3.	Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.	
Block 1	Answer:	
constituents, by INEEL WA excavation pit visible eviden	vidence that a source exists at Site 041. There is no evidence of hazardous stained or discolored soil, or odors. During a June 6, 2001 site investigation conducted .G 10 and Cultural Resource personnel, it was determined that the site includes two is and mounds, likely dug as test pits for INEEL geotechnical investigation. There is no ce of a road leading to the pits/mounds or indication of stained or discolored soil, al, or debris in or around the pits/mounds.	
Block 2	How reliable are the information sources? ☐ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
two large gra	AG 10 and Cultural Resource personnel investigation confirmed that this site contains vel pits/mounds likely used for geotechnical research or construction activities. It is nazardous constituents are present at this site that would pose any threat to human environment.	
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
Interviews, site investigations, and photographs confirm the historical use of the site; photographs confirm the current site conditions.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2, 5,6 Documentation about Data ocess Data Disposal Data QA Data S S Safety Analysis Report Surrence Report Initial Assessment Well Data	

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Question 4.	Is there empirical, circumstantial, or other evidence of migration? If so, what is it?		
Block 1	Answer:		
hazardous co conducted by gravel pits an activities at th established; v areas found a	vidence of migration at Site 041. Site investigations reveal no visual evidence of instituents, stained or discolored soil areas, or odors. A June 6, 2001 site investigation INEEL WAG 10 and Cultural Resource personnel determined that the two large d mounds were likely used for INEEL geotechnical investigations or other construction is former STF/EOCR site. The vegetation surrounding the pits and mounds is well regetation within the site is sparse, which is typical of other mounds and excavated soil across the INEEL. There is no visible evidence of a road leading to the site or of buried ebris in or around the pits or mounds.		
Block 2	How reliable are the information sources? ☑ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)		
mounds is we	spections and photographs of the site show that vegetation surrounding the pits and ell established and no soil staining or discoloration is present, giving no indication of r the presence of contaminants.		
Block 3	Has this INFORMATION been confirmed? Yes No (check one)		
This information was confirmed through site inspections during a 1994 environmental baseline assessment and INEEL WAG 10 and Cultural Resource investigations. Photographs confirm the present site conditions.			
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)		
Anecdotal Historical Pr Current Proc Photographs Engineering Unusual Occ Summary Do	reference list) No Available Information Analytical Data		

Question 5.	Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?		
Block 1	Answer:		
substances or odors. The pa estimated with nature of the p	There is no expected pattern of potential contamination because there is no evidence of hazardous substances or radioactive materials at the site. There is no evidence of stained or discolored soil, or odors. The pattern of hazardous constituents (organics, metals, radionuclides, etc.) cannot be estimated without further field screening or soil sampling. However, because of the origin and nature of the pits/mounds, it is highly unlikely that contaminants would be present at levels above risk-based limits.		
Block 2	How reliable are the information sources? ☑ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)		
site investigat reveal that the	on was obtained from an environmental baseline assessment, and from a subsequent ion conducted by INEEL WAG 10 and Cultural Resource personnel. Investigations is site contains two large pits/mounds likely related to INEEL geotechnical research or ctivities. Photographs of the site show no stained or discolored soil areas.		
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)		
This information	on was confirmed through site investigations, photographs, interviews and historical		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)		
	2, 5,6 Documentation about Data Disposal Data QA Data QA Data Site Drawings D&D Report Urrence Report U		

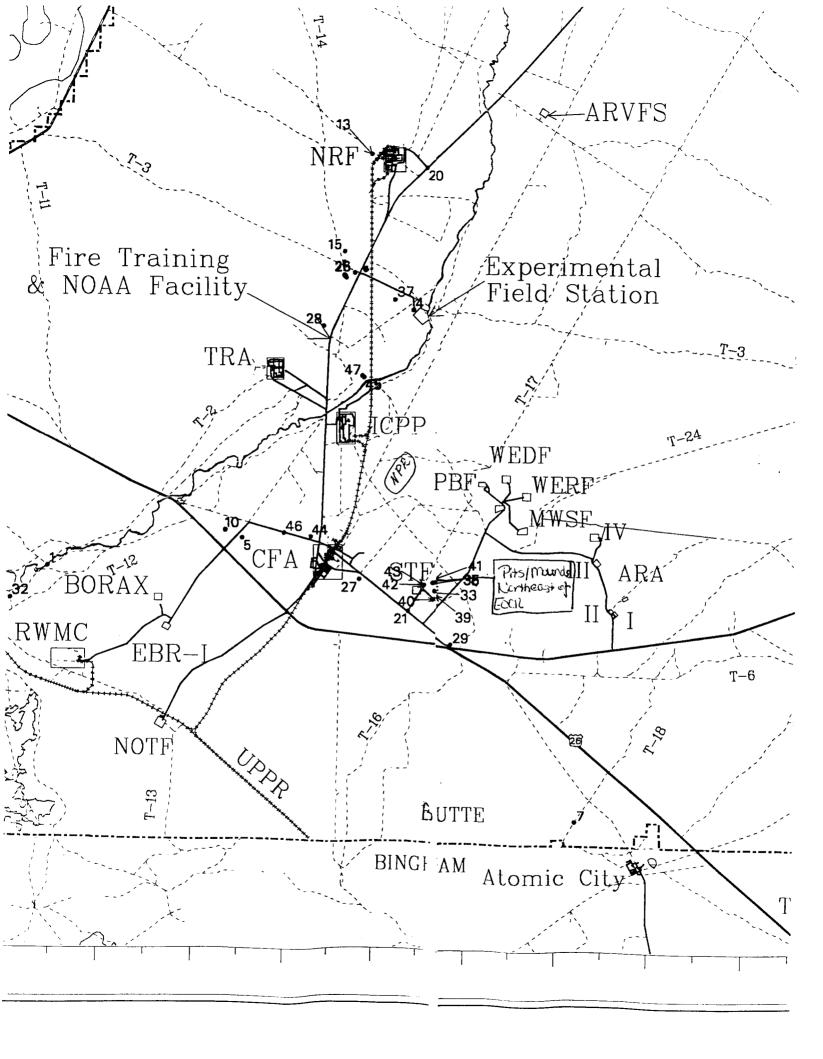
Question 6.	Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.			
Block 1	Answer:			
Site investigations and photographs indicate that Site 041 contains two large shallow pits ~10 ft wide x 40 ft long x 2 ft deep, and two mounds located at the end of each pit. The gravel pits/mounds resemble bulldozer or backhoe excavations. Anecdotal information suggests that the pits/mounds were dug for geotechnical test pits for the former STF/EOCR site. There is no evidence of a source at this site or contaminated region to estimate because there is no evidence of hazardous or radioactive materials.				
Block 2 How reliable are the information sources? Migh Med Low Explain the reasoning behind this evaluation. (check one)				
This information was obtained from a 1994 environmental baseline assessment, and from a recent site investigation conducted by INEEL WAG 10 and Cultural Resources. Neither gave any indication that the site contains anything that would cause potential contamination.				
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)				
Interviews, site investigations, photographs and historical research confirm this information.				
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)				
	2, 5,6 Documentation about Data Disposal Data Disposal Data DA Data Site Drawings D&D Report Currence Report Disposal Data DA Data DAD Report DAD Report DISTRICT OF THE DATA DAD Report DAD Report			

Question 7.	. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.			
Block 1	Answer:			
The estimated quantity of hazardous substance/constituents at this site is near zero, because there is no evidence of any hazardous or radioactive material present at Site 041. The site consists of two large gravel pits and mounds. There is no visible evidence of a road leading to the pits or mounds or of stained or discolored soil, buried material, or debris in or around the pits/mounds. It is not likely that the site contains any material that would pose a threat to human health or the environment.				
Block 2 How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)				
This information was obtained from an environmental baseline assessment, INEEL WAG 10 and Cultural Resource investigation and photographs. There is no indication that the pits/mounds contain anything that would cause potential contamination. Photographs taken of the site show no evidence of staining or discoloration from hazardous substances/constituents.				
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)				
This information was confirmed through site inspections, interviews, photographs and historical research.				
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)			
No Available Information Anecdotal Historical Process Data Current Process Data Photographs Engineering/Site Drawings Unusual Occurrence Report Summary Documents Facility SOPs Other Analytical Data QA Data Disposal Data QA Data D&D Report Initial Assessment Well Data Construction Data				

Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.			
Block 1	Answer:			
There is no evidence that a hazardous substance or constituent is present at levels that require action at this site. INEEL WAG 10 and Cultural Resource personnel determined that the site contains two large excavation pits and mounds likely related to INEEL geotechnical investigations. There is no visible indication of stained or discolored soil, buried material, debris, or hazardous constituents that might pose a threat to human health or the environment.				
Block 2	ock 2 How reliable are the information sources? ☑ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)			
This evaluation is based on interviews, site visitations and photographs of the area. There is no evidence of hazardous constituents at Site 041.				
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)				
This information was confirmed through site inspections, historical research, interviews and photographs.				
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)				
	2, 5,6 Documentation about Data Disposal Data Cess Data QA Data S Safety Analysis Report Site Drawings Unitial Assessment Couments Documents Documentation about Data Disposal Data			

REFERENCES

- 1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID- 10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interview with an Environmental Baseline Assessment team member, February 6-7, 2001.
- 3. Photographs of Site 041: PN99-0494-1-14, -16.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.
- 6. Site investigation conducted by Tom Haney, INEEL WAG 10 and Brenda Ringe Pace, INEEL Cultural Resources, June 6, 2001.



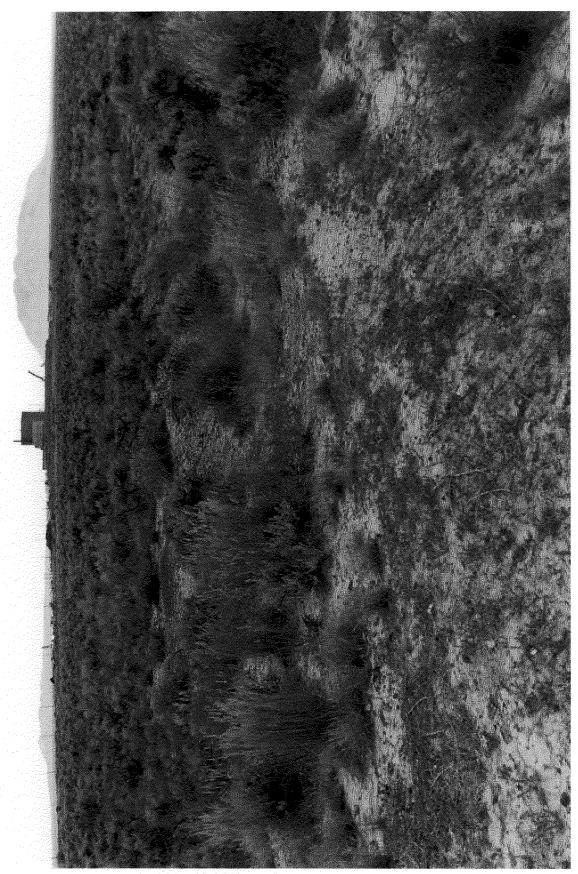
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Attachment A

Photographs of Site #041



Site: 041 Pits/Mounds Northeast of EOCR/STF PN99-0494-1-14



Site: 041 Pits/Mounds Northeast of EOCR/STF PN99-0494-1-16

Attachment B

Supporting Information for Site #041

435.36 04/14/99 Rev. 03

NEW SITE IDENTIFICATION

Pa	Part A - To Be Completed By Observer				
1.	Person Initiating Report: Jacob Harris	Phone: 526-1877			
	Contractor WAG Manager: Douglas Burns	Phone: 526-4324			
2.	Site Title: 041, Pits/Mounds Northeast of EOCR				
3.	Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.				
	There are two pits/mounds approximately 1200 feet north of the berm pits resembling dozer excavations were about 10' X 40' X 2' deep with structure on it. The GPS coordinates of the mound without the wooder coordinates of the mound with the wooden structure are can be found on the summary map as provided.	n a mound at each end. One mound has a small wooden			
Pa	rt B - To Be Completed By Contractor WAG Manager				
4.	Recommendation:				
	This site meets the requirements for an inactive waste site, requirements for	res investigation, and should be included in the INEEL ommended to be included in the FFA/CO. Operable Unit:			
	This site DOES NOT meet the requirements for an inactive waste included in the INEEL FFA/CO Action Plan.	e site, DOES NOT require investigation and SHOULD NOT be			
5.	Basis for the recommendation:				
	The conditions that exist at this site indicate the potential for an inaction or Disturbance of Suspected Inactive Waste Sites.	ve waste site according to Section 2 of MCP-3448 Reporting			
 					
	The basis for recommendation must include: (1) source description; concern; and (4) descriptions of interfaces with other programs, as an	(2) exposure pathways; (3) potential contaminants of plicable (e.g., D&D, Facility Operations, etc.)			
6.	Contractor WAG Manager Certification: I have examined the propose believe the information to be true, accurate, and complete. My recommon to the propose believe the information to be true, accurate, and complete.	ed site and the information submitted in this document and mendation is indicated in Section 4 above.			
Nai	ne: Signature:	Date:			



PROJECT DOCUMENT REVIEW RECORD

northeast of EOCR. The other sentence refers Comment incorporated. We have deleted the the reader to a "berm north of EOCR/STF." Comment incorporated. However, the site is The pits and mounds are north of the berm. Site 041 Track 1 Decision Documentation Package, OU 10-08: Pits/Mounds Northeast of EOCR (DOE/ID Comment noted. The pits and mounds are sentence that stated the gravel was used. directly east of CFA. We have changed "southwest" to "east." Page 13, Block 1 contains the statement "the gravel was used as road directions. Page 1 also states north as the direction to reach the sites. Pages 2 and 8 state that the site is "southwest" of the CFA. The site is southeast of the CFA. Please correct. Last page - The header states the site is "Northeast of EOCR" while fill material..... which probably is intended to offer clarification as and mound should not be comparable unless something was buried misinterpreted though as noted in an earlier comment. It could be read that gravel was removed and therefore the volumes of the pit in the pit. Please clarify the statements to avoid future confusion. the text states it is "north" of EOCR/STF. Please use consistent to why the geotechnical test pits were dug. It could be COMMENT **IDEO** 10949) REVIEWER: Pages 2 and 8 NUMBER DOCUMENT TITLE/DESCRIPTION: Page 13 Block 1 PAGE SECTION NUMBER April 3, 2002 COMMENTS NUMBER HEM DATE:

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